CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of audit

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
	*		

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	*Code of Federal Regulations*
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.

2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.

3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.

4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	X

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

Yes	No
	X

If yes, describe.

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)?

Yes	No
	X

If yes, describe.

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

	Yes	No
• Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]	X	
• Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]	X	
• Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]	X	
• Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]	X	
• SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]	X	
• Record-keeping requirements for BMPs. [40 CFR 403.12(o)]	X	
• Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]	X	
• Modifications to the sampling requirements. [40 CFR 403.12(g)]	X	
• Requirement to report all monitoring results. [40 CFR 403.12(g)]	X	

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

Yes	No
X	

If yes, check which ones.

X	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
X	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

2. a. Are there any planned changes to the POTW's treatment plant(s)?	Yes	No
	X	

If yes, describe.

- **LAG Advanced Water Purification Demonstration Facility (AWPDF)**: LA Sanitation and Environment (LASAN) is creating a bold vision for Los Angeles' water future through a series of interactive water features as part of a new community park and a state-of-the-art advanced water purification facility. The project borders the Los Angeles River and will provide an exciting and dynamic public open space.The Water Technology Center and LA Urban Waterway will be located at the Los Angeles Glendale Water Reclamation Plant (LAGWRP). This will be a multi-functional and multi-beneficial advanced treatment facility. This state-of-the-art facility will showcase the latest technologies for producing recycled water and provide opportunities for public engagement as well as training for operations staff in potable reuse technologies.

- **Ozone Demonstration Project (ODP):** The Ozone Demonstration Project at DCTWRP is designed and operated by LASAN and will produce highly purified water to replenish the City's groundwater in the San Fernando Groundwater Basin. The project will produce up to 10 million gallons per day (mgd) of highly purified water by the end of 2022. The ODP at DCT will add an ozone treatment step after the secondary clarification process prior to the tertiary cloth filters in the Phase 2 treatment train (one of DCTWRP's two parallel treatment trains). The use of ozone will enhance water quality by providing additional chemical and pathogen removal beyond what is achieved through existing tertiary treatment alone.

- **DCT Advanced Water Purification Facility (AWPF):** As part of the City's long-term water management objectives of maximizing local water resources, LASAN will lead the development of the DCTWRP AWPF that will supply purified recycled water to replenish the San Fernando Groundwater Basin via surface spreading known as the Los Angeles Groundwater Replenishment Project. This project will consist of microfiltration (MF), reverse osmosis (RO) and ultraviolet advanced oxidation processes (UVAOP).

- **Hyperion Membrane Bioreactor (MBR)**: The primary goal of the Hyperion Membrane Bioreactor (MBR) Pilot Facility is to obtain the necessary scientific, technical, design, and operational data for the future transformation of HWRP to a 100% water recycling facility (Hyperion 2035). The Hyperion MBR Pilot Facility Project is a collaboration between LASAN, the Los Angeles Department of Water and Power, and the West Basin Municipal Water District. The project plan is to operate the Hyperion MBR Pilot Facility for one year to determine the efficiency of removing pathogens in MBR systems and as a way to collect data that will support the regulatory process for Hyperion 2035.

b. Are these changes to the treatment plant(s) due to pretreatment issues?	Yes	No
		X

If yes, what were the issues?

B. LEGAL AUTHORITY [403.8(f)(1)]

1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes	No
X	

If yes, complete questions b–e.

b. List the contributing jurisdictions.

City of Burbank, City of Glendale, City of El Segundo, City of Santa Monica, City of West Hollywood, City of San Fernando, City of Culver City, and City of Beverly Hills

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes	No
X	

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		X
Notifying IUs of requirements		X
Issuance of control mechanisms		X
Receiving and reviewing IU reports		X
Conducting inspections		X
Conducting compliance monitoring		X
Enforcement of Pretreatment Standards and Requirements		X

SECTION I: DATA REVIEW (CONTINUED)

B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)

	Yes	No
e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?		X

If yes, explain.

	Yes	No
2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?	X	
b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?	X	
c. Did the CA update its procedures and ERP to implement the changes in its SUO?	X	

Explain

	Yes	No
3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?		X

If yes, explain.

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

Subject to the provisions established in 40 CFR 403.3(v) and LAMC Section 64.00, A.70; a Significant Industrial User (SIU) is any of the following:

(a) any discharger of industrial wastewater that is subject to National Categorical Pretreatment Standards;

(b) any other discharger that discharges an average of 25,000 gallons or more per day of process wastewater ("process wastewater" excludes sanitary, non-contact cooling water and boiler blowdown wastewaters) or contributes process wastewater which makes up 5% or more of the average dry weather hydraulic or organic (BOD, TSS, etc.) capacity of the treatment plant;

(c) any discharger that is designated by the Director to have a reasonable potential to adversely affect the POTW's operation or for violating any pretreatment standard or requirement.

The CA has chosen not to include the NSCIU provision. Contributing jurisdictions have been informed in a letter, dated December 2014, that they can include the NSCIU provision into their program.

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU?*

The CA did not implement the middle-tier provision.

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

The CA did not implement the NSCIU provision.

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

SIUs are identified by the CA through the use of a multiple source identification system (e.g. YellowPages.com, the Verizon Telephone Book, etc.), other enforcement agency referrals, inventory canvassing and annual Local Industrial User (LIU) inspection activities, review of permit applications, characterization of an IU's wastewater discharge, periodic flow updates, and an audit of each facility. The CA categorizes an SIU according to federal pretreatment standards based on its primary business activity, industrial operations performed, raw materials used, products produced, industry class, and discharge flow.

Each contributing jurisdiction identifies and categorizes its SIUs through use of a multiple source identification system, review of permit application and inspections.

Discuss any problems.

None.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

The CA updates its Industrial waste Survey [IWS] using databases consolidated from multiple sources to identify and permit new IUs discharging wastewater to the City of Los Angeles sewers on an on-going basis. The current sources of the database utilized for updating the CA's IWS are obtained from YellowPages.com (yp.com), DWP, LATAX business permits, and the CA's Permit Information Management System (PIMS). One source is the result of the L.A. City Building & Safety Department's policy of requiring the CA's approval stamp on new construction and allows identification of new potential IUs. Another source is the addresses of cancelled permits from the PIMS database. The PIMS database holds all the information of the CA's IU inventory. Another source comes from queries in YellowPages.com, i.e. metal finishers within the local jurisdiction. Another source comes from referrals from various governmental agencies, or from companies about competitors. The IWS database generates the list of IUs for canvassing inspections. The process involved in the preparation of the new IU list involves sorting and screening records of IU names and addresses to allow for scheduled facility inspection on a geographical basis. The information gathered from the ongoing facility inspections is used to determine whether the permit to be issued for a new discharger is a Categorical/Significant Industrial User (SIU), a Non-categorical Significant Industrial User (Non-Cat SIU), or a Local Industrial User (LIU). All new permits issued by this process are tracked by the CA.

Each contributing jurisdiction identifies and categorizes its IUS through the use of a multiple source identification system, review of permit applications, and inspections.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

Changes in wastewater discharges can be determined during a facility field inspection and are documented in the inspection narrative report. At a minimum, all IUs are inspected once per year and their industrial discharge flows are updated annually using LA Dept of Water & Power water consumption readings, facility discharge flow meter readings, and any other water usage/supply data . SIU facilities are inspected quarterly and their flows are also updated quarterly. Changes in wastewater discharges may result in reclassification and/or permit amendments. Also, IUs are required by LAMC 64.30.C.1 (d) (9), to notify the City of any new introduction of wastewater constituents or any substantial change in volume or character of their wastewater constituents

Each contributing jurisdiction identifies changes in wastewater discharges using its facility field inspections, major water supplier water consumption readings, facility discharge flow meter readings, and any other water usage/supply data.

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)

4. How many IUs are identified by the CA in each of the following groups?

a.	173		SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		112	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
		N/A	Middle-tier CIUs** (specify below)
		61	Noncategorical SIUs
b.	16,021		Other regulated nonsignificant IUs (specify)
		N/A	Noncategorical nonsignificant IUs
		N/A	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
		28	Zero-discharging CIUs** (specify below)
c.	16,194		TOTAL

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

Refer to 'Attachment 1 – Zero Discharger Inventory 2021' for the list of zero discharging CIUs.

List of Middle-Tier CIUs:

The Middle – Tier was not adopted by the CA

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _____

Not Applicable

List of SIUs with general control mechanisms:

None

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	0	0 %

b. Has the CA implemented any general control mechanisms?

No

c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism?	0
List the types of SIUs covered under a general control mechanism:	
d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	0
If any, explain.	

2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?	Yes

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss

The IU, under an Order directed by the Los Angeles Regional Water Quality Control Board to remediate ground water contaminated with petroleum hydrocarbons, requests the CA to discharge to the sewer collection system since water quality standards are too stringent to discharge wastewater to the storm drain. The IU submits an application to the CA to discharge. The CA conducts a facility inspection and evaluation of the process and unit operations, pretreatment system, pollutants of concern, and discharge flow rate in establishing permit conditions, requirements, factsheet and rationale.

The IU is subject to local limits and semi and total volatile limits and prohibitions. The treatment plants have not experienced any increases in semi and total volatiles loading due to the discharge of wastewater from contaminated groundwater sites. The semi and total volatile limits were established using explosivity screening level criteria based on 10% of the Lower Explosive Limit.

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	X	
b. Is any of the waste hazardous as defined by RCRA?		X
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		X

d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]

Residences that are not connected to the CA's sewer discharge their wastewater directly into cesspools, septic tanks, portable toilets, or other holding devices (the accumulated liquid is known as "septage"). Haulers are hired to pump out septage and discharge it into the CA's designated septage disposal site located at DC Tillman Water Reclamation Plant. The CA does not accept hauled wastes by rail. The CA also allows portable toilet waste to be discharged into the CA's sewer at permitted private septage disposal facilities (PSDF).

The City does not accept or allow the disposal of any RCRA or non RCRA hazardous waste at the designated septage disposal or PSDF sites.

No wastes accepted via truck, rail, or dedicated pipe meet CA's SIU definition.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

Non-residential hauled waste discharge must meet the discharge standards of L.A.M.C. 64.31 D. Any hauler not meeting these requirements is issued Notice-of-Violation and repeat offenders are subject to escalated enforcement actions.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

The CA utilizes the internet to obtain updates on federal, state, and local laws, rules, and regulations. In addition, the CA has a Regulatory Affairs Division to keep abreast of current regulations, as an example ENFLEX. The CA is also a member of the National Association of Clean Water Agencies and the Water Environment Federation. CA staff regularly attends CWEA, WEF and NACWA conferences. CA participates in the Southern California Alliance of Publicly Owned Treatment Works (SCAP) and meet with other POTWs in the Southern California region to discuss emerging pretreatment concerns on a quarterly basis.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set?

CA did not set any new local limits. CA has retained the existing local limits because they have proven to protect the wastewater collection and treatment systems annual local limit evaluations have reaffirmed this report's findings.

b. How were these pollutants selected?

The annual local limits evaluation pollutants are selected based on various environmental protection criteria from EPA recommended pollutants, NPDES permit water quality criteria, waste discharge requirement, water recycling requirement, biosolids beneficial reuse criteria, and biological process inhibition threshold levels.

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

The lowest of the calculated allowable headworks loading for each pollutant of concern for various environmental criteria is selected as the maximum allowable headworks loading or the most stringent criteria.

d. Which allocation method(s) were used?

Uniform allocation method is applied for all IUs. The City also implements individual control mechanisms through special permit conditions for selected IUs to control pollutant loadings into its POTW.

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

The limit basis for the local limit is instantaneous maximum.

f. When was the CA's last local limits evaluation? What was the approval date?

Hyperion Water Reclamation Plant, Los Angeles-Glendale Water Reclamation Plant, Donald C. Tillman Water Reclamation Plant, and Terminal Island Water Reclamation Plant – last evaluation May 2021, see 'Attachment 2 - 2020 Local Limits Evaluation Report'

	Yes	No
g. Has the CA identified any pollutants of concern beyond those in its local limits?		X

If yes, how has this been addressed?

Permit condition on certain individual control mechanisms through special permit conditions for selected IUs

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

None.

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

The CA uses 40 CFR 403 and 1990 Administrative Order Requirements as guidelines to determine monitoring frequencies. The CA was directed by means of the 1990 EPA Administrative Order to sample, inspect, and require reporting frequencies greater than those stipulated in 40 CFR 403. Although the AO expired on September 2, 2002, the CA has decided to maintain the established IU monitoring frequency.

b. Is the frequency established above more, less, or the same as required?

Explain any difference.

As a result of the EPA Administrative Order of 1990 to the City of LA, the CA established a pretreatment program with IU monitoring frequencies (sampling, inspecting, and reporting) equal or higher than required by the AO. While the CA continues to observe its pretreatment program established frequencies, SIU self-monitoring frequencies are being amended through a Substantial Pretreatment Program Modification approved by LARWQCB from monthly and bi-monthly to a semi-annual monitoring frequency. Certain SIU's under escalated enforcement or with approved slug discharge control plans are kept on monthly and bi-monthly monitoring frequencies.

Program Aspect	Inspection		Inspection	POTW Sampling		POTW Sampling		IU Self - Monitoring		IU Self-Monitoring
	Required Annual Frequency		Actual Annual Frequency	Required Annual Frequency		Actual Annual Frequency		Required Annual Frequency		Actual Frequency
	Fed	AO		Fed	AO	Fed	Local	Fed	AO	
413s <10,000 gpd	1	1	4	1	1	2	4	2	2	2
Other CIUs < 10,000 gpd	1	4	4	1	4	4	4	2	6	6
Other CIUs > 10,000 gpd	1	4	4	1	4	4	4	2	12	12
NC-SIUs**	1	NA	4	1	NA	2		2	NA	2

NOVs are issued for failure to self-monitor in addition to make-up self-monitoring required in administrative orders.

**The City samples NC-SIUs twice/yr although federal regulations only require once/yr. Federal regulations allow the POTW to monitor in lieu of the IU. However, the City has elected to continue requiring twice/yr self-monitoring. NOVs are issued for failure to self-monitor in addition to make-up self-monitoring required in administrative orders.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

No. CA does not perform IU monitoring for IUs required to perform self-monitoring.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period _01/01/2019_ to _01/01/2020_.)

a. Not sampled or not inspected at least once [WENDB – NOIN]	0	0	%
b. Not sampled at least once [RIDE – SIUs Not Sampled]	0	0	%
c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]	0	0	%

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period: 2020 Calendar Year

11	6.36	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by:
3	1.73	%	Self-monitoring requirements	**POTW**
0	0	%	Pretreatment compliance schedule(s)	**EPA** X

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

CDEQ, Inc. and Spa De Soleil, Inc.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: 2020 Calendar Year

Number of SIUs: 133

Names of SIUs: Refer to 'Attachment 3 – SIUs 100_ Compliance'

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

The following is a summary description of the CA's basic inspection.

The CA's basic inspection begins with a pre-inspection file review aimed at planning and preparing the inspector for the on-site inspection(s). In addition to gathering and updating baseline information during on-site inspections, the CA's basic inspection of IUs includes checking for compliance/non-compliance with federal and local discharge standards and permit conditions. The onsite inspections serve to identify and document any changes in operation or discharge.

There are six major areas inspected (6 P's) in the IUs to ensure compliance to CA's discharge standards and permit conditions.

PLANS - The first inspection area is checking and verifying the facility plans against what is observed on site and determining if there are any changes i.e., removal, replacement, relocation etc., of tanks, plumbing, flow directions, etc.

PRODUCTS - The second inspection area is the production line to determine if new products were produced other than expressly indicated in the permit.

PROCESS - The third inspection area is examining the process area thoroughly to see where process water in the facility comes into contact with products. Document areas where pollution prevention practices is needed.

POLLUTANTS - The fourth inspection area is checking the pollutants introduced into the process water during production and comparing the pollutants observed against those indicated in the permit.
PRETREATMENT - The fifth inspection area is checking the pretreatment system(s) used by the IU to remove/reduce pollutants in the wastestream(s). Check if pretreatment equipment controls are within operating limits. Check and document inspection of pH monitoring and ORP equipment.

PARAMETERS - The sixth area is sampling and testing the discharged water to check if it meets the parameters set in the IU's permit. A chain of custody and record of sampling form is used when samples are obtained during inspection(s).

In addition to the six major areas, the inspections cover chemical and hazardous waste storage areas, chemical spill prevention, hazardous waste handling procedures and monitoring records. .

Lastly, a post-inspection interview is held with the IU. The IU is informed of any deficiencies noted during the inspection and on areas which may need improvements. The IU is informed of any violations and the issuance of a notice-of-violation. The IU is offered an opportunity to ask about discrepancies in the wastewater permit, permit special requirements, sampling requirements, or any other issues

Request a copy of the CA's inspection form, if applicable.

CA's inspection form has the format of a free-form narrative.

5. Who performs the CA's compliance monitoring analysis?

	Performed by: CA/Contract Laboratory Name
• Metals	CA/Environmental Monitoring Division
• Cyanide	CA/Environmental Monitoring Division
• Organics	CA/Environmental Monitoring Division
• Other (specify)	

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves		Sample Splits	X
Chain-of-custody forms		Sample Blanks	X
New Sampling Tubes		Sample Spikes	X
Field Blanks	X	Other:	
Other:			

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

None

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)]

Yes	No
	X

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

The CA notifies IUs of reporting requirements for uncontrolled or slug/accidental discharge, not limited to the CA but including state and federal requirements, in the Industrial Waste Permit. Also included in the permit, is a list of prohibitions for discharge, including hazardous materials.

Last notification is in the IU's permit or permit renewal package.

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

On an annual basis, the CA uses a Slug Control Plan form/questionnaire that is completed by the inspector during an inspection to evaluate the need for a SIU to have a slug control plan. The questionnaire addresses requirements for the response to an SIU's slug discharge, adequate spill containment/berming, and employee notification.

List SIUs required to have a slug discharge control plan:

Anheuser Busch W-424178, W-495380

Baxalta US, Inc W-561560

CDEQ, Inc W-499022

Emerald Transformers W-554526

Phillips 66 W-536165

Rio Tinto W-429086

Spectrolab W-495606

West Coast Metal Finishing W-547247

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

Yes	No
X	

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

The Director shall identify a discharger as meeting one or more of the Significant Noncompliance (SNC) criteria listed in 40 CFR Section 403.8(f)(2)(viii) and shall publish notice in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. The criteria for SNC shall be as follows:
(a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter taken during a six (6) month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including Instantaneous Limits;
(b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six (6) month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits, multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH);
(c) Any other violation of a Pretreatment Standard or Requirement (Daily Maximum, long-term average, Instantaneous Limit, or narrative standard) that the Director determines has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of POTW personnel or the general public;
(d) Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the Director's exercise of its emergency authority to halt or prevent such a discharge;
(e) Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in the permit or enforcement order for starting construction, completing construction, or attaining final compliance;
(f) Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
(g) Failure to accurately report noncompliance; or
(h) Any other violation(s), which may include a violation of Best Management Practices, which the Director determines will adversely affect the operation or implementation of the local pretreatment program.

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

Yes

b. Has the ERP been approved by the Approval Authority?

Yes

c. Does the ERP describe how the CA will investigate instances of noncompliance?

Yes

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response?

Yes

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

Yes

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

Yes

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

Refer to 'Attachment 4 – Examples of Enforcement Cases'

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]	X	
b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.	X	

Refer to 'Attachment 5 – SIU on Compliance Schedule in 2020'

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]	Yes	No
	X	

If yes, attach a copy.

Refer to 'Attachment 6 – SNC 2020 Proof of Publication'

If no, explain.

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?	0
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?	0

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unknown	Explain
• Interference		X		
• Pass through		X		
• Fire or explosions (flashpoint, and such)		X		
• Corrosive structural damage		X		
• Flow obstruction		X		
• Excessive flow rates		X		
• Excessive pollutant concentrations		X		
• Heat problems		X		
• Interference due to oil and grease (O&G)		X		
• Toxic fumes		X		
• Illicit dumping of hauled wastes		X		
• Worker health and safety		X		
• Other (specify)				

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]	Yes	No
		X

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?	Yes	No
	X	

b. If yes, how many were due to nondomestic waste issues (O&G blockages)?

None

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

All information, except for discharge and effluent data, submitted to the CA may be claimed by the industrial discharger to be confidential. Any such claim must be asserted at the time of submission of the information or data to the City. The claim may be asserted by stamping the words "Confidential" or "Confidential Business Information" on each page containing such information or by other means. However, if no claim is asserted at the time of submission, the CA may make the information available to the public without further notice. If such a claim is asserted, the information is treated in accordance with the procedures set forth in 40 CFR Part 2 (Public Information).

Effluent data (any source of discharge of any pollutant) submitted to the CA is available to the public and not eligible for confidential treatment.

2. How are requests by the public to review files handled?

Requests by the public are handled per the Public Records Act as follows:

a. Record requests are submitted through the City of Los Angeles Next Request Portal
b. Locate the records requested
c. Determine which of the requested records legally must be withheld and why
d. When appropriate, take action to obtain payment or assurance of payment
e. Issue a determination within 10 working days to the requestor of which records will be disclosed and which will be withheld (40 CFR 2.112)

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

No, the CA does not currently accept electronic reporting from IUs. The CA does plan to accept electronic reporting from IUs when a new pretreatment information and data management system is in place in a few years.

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

The CA's existing data management system has a module to record and track each IU's pretreatment implementation and system onsite. The existing data management system also has a module to generate, record and track each violation and notice of violation to IUs and the associated enforcement activities, and the responses from IUs for those enforcement activities.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

The public is included in the stakeholder process and is notified of Board of Public Works and City Council hearings. Although not all steps are applicable to every SUO amendment, some of the major steps to ensure public participation during revisions to SUO and/or local limits are as follows:

- Conduct initial briefings to City officials to inform them of proposed revisions to the SUO
- Prepare and mail out outreach materials
- Establish an effective stakeholder process and conduct stakeholder meetings
- Brief various City offices including the Mayor's Business team, and council staff
- Prepare and conduct public workshops
- Send out notifications informing the public about the upcoming workshops
- Address public concerns
- CEQA Review
- Notify public about scheduled hearings
- Maintain an up-to-date website
- Conduct Customer Surveys
- Publish periodic newsletters

6. Explain any public or community issues affecting the CA's pretreatment program.

On February 1st, 2018, the LA Industry team fulfilled the objective to bring awareness to the metal plating and processing sector of SCAQMD existing and proposed air rules, communicated the availability of non-toxic chemicals that can be substituted for toxic compounds that is currently in use, and demonstrated existing and proposed Best Management Practices (BMP) that addresses fugitive emissions at the business symposium. LASAN introduced the Clean Up Green Up Ombudsperson to forty-seven (47) companies including nine (9) hexavalent chromium platers. During the symposium, metal finishers were introduced to the successful implementations of sustainable practices and alternative technology by two industry leaders, E/M Coating and Valley Plating. The former discussed how water conservation methods such as an reverse osmosis (RO) system helped reduce costs, while the latter boasted a complete switch from hexavalent chromium to trivalent chromium with zero drainage discharge while still maintaining significant profitability margins. During the symposium, stakeholders engaged in discussions on the benefits of Green Chemistry and were encouraged to apply the 12 principles to their design, development, and implementation of chemical products and processes that reduce or eliminate the use and generation of hazardous substances. Metal finishers are incentivized to switch to best management practices and alternative technologies, and take advantage of water and energy efficiency rebates, technical assistance, and financial incentives available to local businesses. LA Industry team has continued to engage and communicate with the metal finishers through networking with metal finishing association and keep abreast on upcoming regulation and current technologies. Future outreach concerning this matter will be prioritized when necessary.

7. How long are records maintained? [403.12(o)]	3 Years

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program.

Activity	FTEs	Activity	FTEs
Legal Assistance	0.1	Sample Analysis	
Permitting	26	Data Analysis: Review and Response	17
Inspections	32	Enforcement	13
Sample Collection	25	Administration	129.
		Total Number of FTEs	126

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)	Yes	No
	X	

If not, explain.

3. a. Estimate the annual operating budget for the CA's program. $ 13,307,837

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)?

Funding is expected to either remain the same or increase for the following years.

Discuss any changes in funding.

Funding could increase by 3-5%.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

CA does not have any at this time.

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES (continued) [403.8(f)(3)] (continued)

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

1) The CA has a formal Environmental Compliance Inspector training program developed specifically for the CA.

2) Managers attend NACWA/EPA Conferences annually.

3) CA staff attend California Water Environment Association (CWEA) and WEF conferences and participate in the EPA Pretreatment Training sessions.

4) The CA utilizes the internet to obtain updates on federal, state, and local laws, rules, and regulations.

b. Does the CA have adequate reference material to implement its program?

Yes	No
X	

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the POTW monitored in the past year?

See 'Attachment 7 – POTW Monitoring'

	Influent	Effluent	Sludge	Ambient (Receiving Water)
• Metals				
• Priority pollutants				
• Biomonitoring				
• Toxicity Characteristic Leachate Procedure (TCLP)				
• Extraction Procedure (EP) toxicity				
• Other (specify)				

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Less	Equal	More
		X

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

c. Is the CA reporting these results to the Approval Authority?	Yes	No
The results are reported quarterly	X	

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

	Yes	No
• Improvements in POTW operations	X	
• Loadings to and from the POTW	X	
• NPDES permit compliance	X	
• Sludge quality?	X	
• Sludge disposal options?		X
b. Has the CA documented these findings?	X	

Explain. (Attach a copy of the documentation, if appropriate.)

See 'Attachment 8 – Heavy Metals'

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

The success of the City's pretreatment program is exemplified by the production of Class A Biosolids at Hyperion Treatment Plant and Terminal Island Water Reclamation Plant. All metals and nutrients detected during the regular monitoring of composite samples taken from these treatment plants were below their respective pollutant concentrations listed in EPA 40 CFR 503.13 to ensure continued 100% beneficial reuse. Also, pathogen densities were all below the EPA 40 CFR Part 503 limits for Class A biosolids.

Discuss on a pollutant-by-pollutant basis.

Cadmium - The loading rate for cadmium to HWRP has decreased by 98.2% since 1976. No noticeable increase is present within a 3 year data analysis from 2018-2020. Current sampling indicates cadmium to be well below Monthly Average Concentration limit found in CFR 503.13.

Chromium - The loading rate for chromium to HWRP has decreased by 96.6% since 1976. Analysis of a 3 year data set indicated 2 samples that qualify as outliers with statistical analysis. Using the raw data, the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.23.

Copper - The loading rate for copper to HWRP has decreased by 82.9% since 1976. Analysis of a 3 year data set indicated 3 samples that qualify as outliers with statistical analysis. Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

Lead - The loading rate for lead to HWRP has decreased by 96.7% since 1976. Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

Mercury - The loading rate for mercury to HWRP has decreased by 98.2% since 1976. Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

Nickel - The loading rate for nickel to HWRP has decreased by 94.4% since 1976. Analysis of a 3 year data set indicated 1 sample that qualified as an outlier with statistical analysis. Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

Silver - The loading rate for silver to HWRP has decreased by 98.9% since 1976. Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

Zinc - The loading rate for zinc to HWRP has decreased by 92% since 1977 (No data available for the year 1976). Analysis of the raw data indicates the pollutant loading is well below the Monthly Average Concentration limit found in CFR 503.13.

All pollutants are below concentration limits and pose no danger to HWRP operations or effluent/biosolid quality.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

	Yes	No
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	X	

If yes, what was found?

The City conducts comprehensive monitoring and evaluation of pollutants of concerns from industrial, commercial and domestic sources on a regular basis as per NPDES local limit evaluation and reporting requirement. At the event of an increased pollutant loading to treatment plants, the City investigates the specific pollutant's sources.

	Yes	No
5. a. Has the CA implemented any kind of public education program?	X	
b. Are there any plans to initiate such a program to educate users about pollution prevention?	X	

Explain.

The City of Los Angeles, LA Sanitation and Environment, Industrial Waste Management Division (IWMD) administers the City's Pretreatment and Source Control program to protect public health, wastewater conveyance and treatment system and ultimately ensure the beneficial reuse of recycled water. IWMD launched LA Industry, a data driven pollution prevention and public education outreach program in 2016 to help businesses thrive in the Los Angeles area while achieving environmental compliance and meeting source control objectives. This public-private collaboration fosters trust by creating a business-friendly environment, to increase business retention rates, to demystify regulations for local businesses, to promote source reduction and waste minimizations, and to advocate for pollution prevention and best management practices to the businesses. To achieve greater success with each industry sector, IWMD developed in-house expert champions to maintain consistent and continuous communication and engagement. The current industry sectors are Food Industry, Metal Finishers, Textile Industry, Car Wash Industry, Micro Brewery, Groundwater, Cannabis, and Laundry industries. The sector champions promote sustainability and pollution prevention through regulatory assistance and P2 Checklists including principles from Circular Economy, Biomimicry and Green Chemistry.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

Dental Amalgam Program

Dental offices engaged in the placement or removal of dental amalgam on a regular basis are classified as "Local Industrial User - Dental Industrial User (LIU-DIU)" in the City's inventory of industrial wastewater dischargers. Permit issuance for such dental offices was completed by October 2019 requiring them to install the amalgam separator and implement two Best Management Practices as required by 40 CFR 441 (Dental Amalgam Rule) promulgated by EPA on July 14, 2017. The Dental Amalgam Rule also requires the submission of One-time Compliance Report (OTCR) by October 12, 2020 for existing dischargers and 90 days from the introduction of dental amalgam wastewater for new dischargers or transfer of ownership. Following the issuance of permit, the dischargers were reminded in March 2020 through notification letters and through phone calls in September 2020 and May 2021. About 92% of the dental offices subject to the Dental Amalgam Rule have submitted the OTCR and the remaining dischargers have been reminded to submit them.

Fats, Oil and Grease Control Program

In order to prevent sewage overflows into the environment, LASAN has developed a comprehensive program to reduce the discharge of FOG to the sewer system.

This program includes:

- Regulatory control of food service establishments (FSEs)
- Public outreach to residences
- Improved preventive maintenance

The City's Fats, Oil and Grease (FOG) Control regulates Food Service Establishments (FSEs) located in the City of Los Angeles. All FSEs that potentially generate waste grease are required to obtain an industrial wastewater permit, and use Best Management Practices (BMPs) to reduce grease discharged to the sewer system. Any FSE that is known to cause grease-related sewer overflows or fails to implement BMPs will be required to install a grease interceptor or a grease trap when it is not feasible to install a grease interceptor. All new construction of FSEs must include installation of a grease interceptor.

The FOG Control Program requirements are specified in the Los Angeles Municipal Code Section 64.30 and the Board of Public Works' Rules and Regulations Governing Disposal of Industrial Wastewater into Publicly Owned Treatment Works of the City.

Dry Cleaner Control Program

The City's Dry Cleaner Control Program controls and regulates the management and disposal of solvents, solvent waste and separator water from dry cleaners. Under this program, dry cleaner facilities are required to either obtain an Industrial Wastewater Permit from the City if they intend to discharge to the sewer, or to self-certify that they do not discharge dry cleaning waste to the sewer.

Household Hazardous Waste Safe Centers

The City operates six household hazardous waste permanent collection sites throughout the City, known as S.A.F.E. (solvents/ automotive/flammables/electronics) Centers. The S.A.F.E. Centers are open every weekend and provide a timely and convenient way for the public to dispose of residential waste, including unwanted medications. In addition, the City sponsors periodic mobile collection events on weekends, where residents can drop-off their waste to be properly disposed. These mobile events are held in areas not readily served by the S.A.F.E. Centers. For Conditionally Exempt Small Quantity Generators, four of the six centers accept waste from businesses on an appointment only basis.

Toxic Organic Management Plan (TOMP)

The CA continues to implement its procedures for IUs to prepare, certify, and submit a streamlined Toxic Organic Management Plan (TOMP). The CA adopted a simplified procedure in 2001 for preparing a TOMP making use of the fact that much of the paperwork requested by the USEPA is already on file. Requested paperwork by an IU occurs upon filing for a permit and is updated upon each permit renewal cycle. It is also known, through periodic monitoring of the discharge by the CA, which facilities are consistently compliant. Once the streamlined TOMP has been approved by the CA, the IU is authorized to certify compliance rather than monitor for Total Toxic Organics (TTO). The streamlined TOMP consists of two single-page forms: the Request for TOMP Approval and the TOMP Checklist. The TOMP Checklist covers all of the USEPA Requirements for obtaining a TOMP in an abbreviated, yet comprehensive and easy to complete format. The Request for TOMP Approval allows the IU to certify that their Plan is being implemented and that they comply with TTO pretreatment standards.

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?	Yes	No
	X	

Explain.

Juanita's Food located in one of the City's Environmental Justice areas was juggling with compliance issues. Through the pollution prevention and sector champion's team, IWMD brought together LADWP and GreenBiz program specialists to visit Juanita's Foods. During the site visit, the owner facilitated a plant tour for the team to learn about her business operations and her challenges to reduce their BOD (Biological Oxygen Demand) and SS (Suspended Solids) concentrations in their wastewater. High BOD and SS concentration in wastewater is subject to surcharge fees. IWMD was able to share our experience with a local brewery who has had success in lowering their BOD and SS with an anaerobic digestion pretreatment system and put the owner in contact with the brewery staff. LADWP water conservation specialists identified several applicable rebates and incentives available that will significantly reduce their utility bill. The team also identified other potentials for water and energy savings, wastewater quality surcharge fee savings, and could qualify for the Green Business certification program. Please refer to the attached newsletter.